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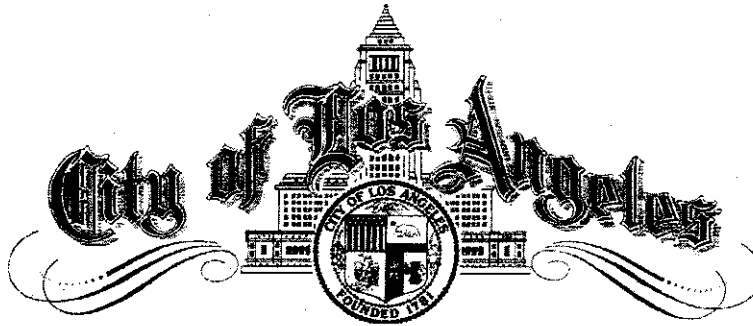
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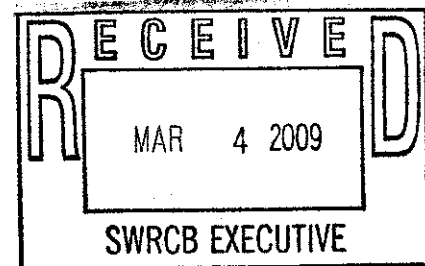
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ANTONIO R. VILLARAIGOSA  
MAYOR

March 4, 2009

Ms. Tam M. Dudoc, Chair,  
and Members of the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814



Attn: Jeanine Townsend, Clerk to the Board

**CITY OF LOS ANGELES BUREAU OF SANITATION COMMENTS ON AMENDMENT  
TO THE POLICY FOR IMPLEMENTING THE CLEAN WATER STATE REVOLVING  
FUND (CWSRF)**

Dear Chair Dudoc:

Thank you for the opportunity to comment on the proposed Policy for Implementing the Clean Water State Revolving Fund (the Policy). We appreciate the effort that SWRCB staff has made to draft a policy for a fair and reasonable distribution of funds from the American Recovery and Reinvestment Bill of 2009 (or stimulus package), while meeting the strict requirements of that Bill, in an extremely short time frame. We are writing at this time to support and propose some policy considerations to take into account as you shape your criteria for the allocation of the funds.

1. With over four million residents, the City of Los Angeles has about 10.5% of the population of the State of California; if we add to that the populations of the neighboring cities which contract for our municipal services, the numbers are even greater. Our impact on the water quality environment of Southern California is clearly significant. It is also notable that our water supply is largely based on imports. If fully funded for our proposed projects, including those for

green infrastructure, we could achieve important reduction in pollutant loads to the Southern California waters, and also make progress toward statewide goals of reduction in water demand and increase in our local water supplies.

2. The City of Los Angeles also has a large percent of low income communities. In the 2000 census, 70% of the census tracts in Los Angeles met the definition of low income (80% of the median household income). In addition, 22.1% of the City's population is below the poverty line. Our City is committed to local hire and we will develop our green workforce and support our existing workforce development through the projects you will fund. Our estimate is that we will save 290 jobs and create 40 new ones through the list of projects for which we will be submitting applications.
3. We suggest that the following criteria be considered in making your funding determinations for other than the wastewater collection and treatment plant category:
  - a) Greatest weight (highest order of preference) should be given to those projects which would beneficially impact our water supply by demand reduction and increase in local supply (such as through water conservation, recycled water, stormwater retention); and that also achieve energy demand reduction and demonstrate design for and adaptability to climate change issues.
  - b) High priority should be given to those projects that demonstrate innovation and that also provide statewide benefit. As with all crises, we are provided an opportunity for leadership toward new methods and paradigms. Priority should be given to those projects that will support new technologies and methods, so that we can more immediately change course toward the further development and implementation of more sustainable and environmentally sound projects.
  - c) Preference should be given to those projects that have multiple benefits, such as those that include a low impact development approach which improves water quality in our streams and/or coastal waters; assists with flood control; creates native habitat; increases open space for active or passive recreation or provides better access to open space.
  - d) The project has water quality benefits in that it contributes to meeting existing water quality regulations such as TMDLS or contributes to groundwater cleanup efforts.
  - e) Demonstrates long term sustainability, including operations and maintenance sustainability.

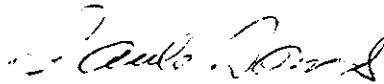
Ms. Tam M. Dudoc, Chair  
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4. Because of the difficult economic circumstances facing our city budget, we encourage you to consider increasing the grant proportion of your funding allocations, to the maximum possible. We understand that at least 50% must be grants and we hope that a greater amount will be considered. Along those lines, to the extent that you are awarding loans, please consider zero to the lowest interest rate possible in order to get these projects funded with minimal impact to the debt burden on struggling municipalities.
5. We fully support the allocation of a substantial block of funding to the Santa Monica Bay Restoration Commission (SMBRC), specifically for projects protective of the Santa Monica Bay. SMBRC has the scientific expertise and oversight capacity to act on behalf of the State in determining priorities for funding.

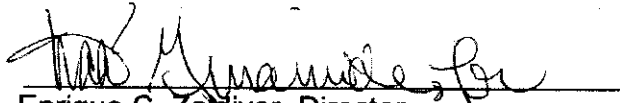
We are ready with about \$60 million of projects, about 20% of which are for Green Infrastructure projects.

Thank you for considering our input.

Sincerely,



Paula A. Daniels, President Pro Tempore  
Board of Public Works



Enrique C. Zaldivar, Director  
Bureau of Sanitation

cc:

Arthur G. Baggett, Member, State Water Resources Control Board  
Charles R. Hoppin, Member, State Water Resources Control Board  
Francis Spivy-Webber, Member, State Water Resources Control Board  
Dorothy C. Rice, Executive Director, State Water Resources Control Board